

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)
)
 v.) MOTION FOR ADMISSION
) OF PAULA JUNGHANS
) *PRO HAC VICE*
 ROBERT COPLAN,)
 MARTIN NISSENBAUM,)
 RICHARD SHAPIRO, and) 07 Cr. 453 (SHS)
 BRIAN VAUGHN,)
)
 Defendants.)
)

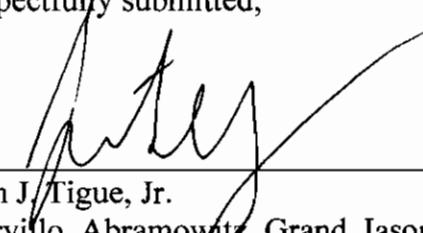
PLEASE TAKE NOTICE that, pursuant to Rule 1.3(c) of the Local Rules of the
United States District Courts for the Southern and Eastern Districts of New York, I, John J.
Tigue, Jr., a member in good standing of the bar of this Court, hereby move for an Order
allowing the admission *pro hac vice* of:

Paula M. Junghans
Zuckerman Spaeder LLP
1800 M Street, NW, Suite 1000
Washington, DC, 20036
Tel: 202-778-1850
Fax: 202-822-8106
E-Mail: pjunghans@zuckerman.com

Ms. Junghans is a member in good standing of the Bars of the District of Columbia
and the State of Maryland. There are no pending disciplinary proceedings against Ms.
Junghans in any State or Federal court.

Dated: June 20, 2007
New York, New York

Respectfully submitted,



John J. Tigue, Jr.
Morvillo, Abramowitz, Grand, Iason,
Anello & Bohrer P.C.
565 Fifth Avenue
New York, NY 10017
Phone: 212-856-9600
Fax: 212-856-9494

To: Clerk of the Court
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Deborah E. Landis, Esq.
Jaikumar Ramaswamy, Esq.
Assistant U.S. Attorneys
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007

Charles E. Clayman, Esq.
Brian D. Linder, Esq.
Clayman & Rosenberg
305 Madison Avenue
New York, NY 10165

Paul B. Bergman, Esq.
950 Third Avenue
New York, NY 10022

Peter H. Barrett, Esq.
Butler, Snow, O'Mara, Stevens
& Cannada, PLLC
P.O. Drawer 4248
Gulfport, MS 39502

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)	AFFIDAVIT OF JOHN J. TIGUE, JR. IN SUPPORT OF MOTION TO ADMIT COUNSEL <i>PRO HAC VICE</i> 07 Cr. 453 (SHS)
)	
v.)	
)	
ROBERT COPLAN,)	
MARTIN NISSENBAUM,)	
RICHARD SHAPIRO, and)	
BRIAN VAUGHN,)	
)	
Defendants.)	
)	

STATE OF NEW YORK :
 : ss.:
 COUNTY OF NEW YORK :

John J. Tigue, Jr., being duly sworn, hereby deposes and says as follows:

1. I am a principal in the firm of Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer P.C., attorneys for Defendant Richard Shapiro in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Paula M. Junghans as counsel *pro hac vice* to represent Defendant Robert Coplan in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1967. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Paula M. Junghans since 1980.

4. Ms. Junghans is a partner in the firm of Zuckerman Spaeder LLP, in Washington, DC. She has tried numerous cases in federal courts through the United States, including the District of Maryland, the Eastern District of Virginia, the Eastern District of

Pennsylvania, the District of West Virginia, the District of Kansas, and the Eastern District of Tennessee. She is admitted to the United States Courts of Appeals for the Fourth, Fifth, Sixth and Tenth Circuits, the United States Tax Court, the Court of Federal Claims, and the United States Supreme Court, and is a fellow of the American College of Trial Lawyers and the American College of Tax Counsel. From 1998 to 2001, Ms. Junghans served as the Deputy Assistant Attorney General and the Acting Assistant Attorney General of the Tax Division of the United States Department of Justice.

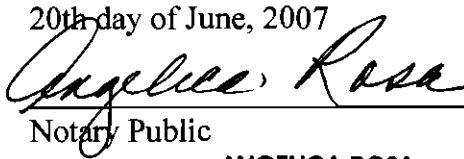
5. I have found Ms. Junghans to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Certificates of Good Standing from the Courts of Appeal of Maryland and the District of Columbia Bar are attached hereto as Exhibits A and B, respectively.

6. Accordingly, I am pleased to move the admission of Paula M. Junghans, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Paula M. Junghans, *pro hac vice*, which is attached hereto as Exhibit C.

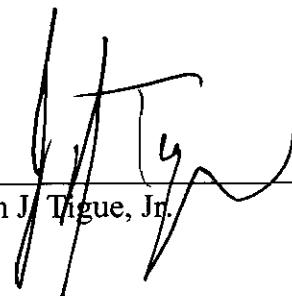
WHEREFORE it is respectfully requested that the motion to admit Paula M. Junghans, *pro hac vice*, to represent Defendant Robert Coplan in the above-captioned matter, be granted.

Sworn to before me this
20th day of June, 2007



Angelica Rosa
Notary Public

ANGELICA ROSA
Notary Public, State of New York
No. 01R04620597
Qualified In Queens County
Commission Expires 11/30/2009



John J. Tigue, Jr.

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland, do hereby certify that on the twenty-ninth day of December, 1976,

Paula Marie Junghans

having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court.

In Testimony Whereof, I have hereunto set my hand as Clerk, and affixed the Seal of the Court of Appeals of Maryland, this fourteenth day of June, 2007.

Alexander L. Cummings
Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

PAULA MARIE JUNGHANS

was on the 2ND day of NOVEMBER, 2001

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on June
13, 2007.

GARLAND PINKSTON, JR., CLERK

By: Che Jackson
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)	ORDER ADMITTING PAULA JUNGHANS <i>PRO HAC VICE</i> 07 Cr. 453 (SHS)
v.)	
ROBERT COPLAN,)	
MARTIN NISSENBAUM,)	
RICHARD SHAPIRO, and)	
BRIAN VAUGHN,)	
Defendants.)	
)	

Upon the motion of John J. Tigue, Jr., attorney for Richard Shapiro, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Paula M. Junghans
 Zuckerman Spaeder LLP
 1800 M Street, NW, Suite 1000
 Washington, DC, 20036
 Tel: 202-778-1850
 Fax: 202-822-8106
 E-Mail: pjunghans@zuckerman.com

is admitted to practice *pro hac vice* as counsel for Robert Coplan in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: June ____, 2007
 New York, New York

 United States District Judge

CERTIFICATE OF SERVICE

I, Kristy Watson Milkov, counsel for Richard Shapiro, do hereby certify that on June 20, 2007, I caused to be served a copy of the within Motion for Admission of Paula M. Junghans *Pro Hac Vice* on the following attorneys by U.S. Mail.

Deborah E. Landis, Esq.
Jaikumar Ramaswamy, Esq.
Assistant U.S. Attorneys
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007

Charles E. Clayman, Esq.
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Kristy Watson Milkov